



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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RMT/JN/DG  
F. # 2012R00103

271 Cadman Plaza East  
Brooklyn, New York 11201

May 24, 2018

By ECF, Email and FedEx

Steven Brill, Esq.  
Sullivan Brill  
115 Broadway, 17th Floor  
New York, New York 10006

Mildred M. Whalen  
Federal Defenders of New York, Inc.  
1 Pierrepont Plaza, 16<sup>th</sup> Floor  
Brooklyn, NY 11201

Re: United States v. Vitaly Korchevsky et. al.  
Criminal Docket No. 15-381 (RJD)

Dear Counsel:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure and Rule 702 of the Federal Rules of Evidence, the government hereby notifies you that, at the trial in the above-referenced matter, the government plans to call the below listed witness as a linguist expert. The government reserves the right to substitute this expert with other expert witnesses, and will timely advise the defense of any changes in witnesses.

The government previously disclosed that it planned to call Sergey Kalman as an expert witness. The government is now disclosing that it will replace Mr. Kalman's testimony as a certified Russian translator with that of Yana Agoureev. The government will also replace the testimony of Mr. Kalman as a certified Ukrainian translator with that of Valentina Bren-Buzil.

Ms. Agoureev is a language specialist in Russian-English language services. The government expects to introduce at trial Russian-language documents as well as other exhibits. Ms. Agoureev is expected to testify that she translated and/or verified the accuracy of translations of certain documents and other exhibits. She will testify that the finalized transcripts she translated and/or verified are true and accurate English translations of the original documents and other exhibits. Ms. Agoureev's curriculum vitae is attached hereto.

Similarly, Ms. Bren-Buzil is a language specialist in Russian-English and Ukrainian-English language services. The government expects to introduce at trial Ukrainian-language documents. Ms. Bren-Buzil is expected to testify that she translated and/or verified the accuracy of translations of certain documents. She will testify that the finalized transcripts she

translated and/or verified are true and accurate English translations of the original documents. Ms. Bren-Buzil's curriculum vitae is attached hereto.

As stated above, the government reserves the right to call substitute expert witnesses, as well as to call additional expert witnesses, and will provide advance notice of any intent to do so.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/  
Richard M. Tucker  
Julia Nestor  
David Gopstein  
Assistant U.S. Attorneys  
(718) 254-6107/6297/6153

Enclosures

cc: Clerk of the Court (RJD) (by ECF (w/o enclosures))